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GJJM ENTERPRISES, LLC, d/b/a Stiletto,  
185 S. South Carolina Ave.  
Atlantic City, NJ 08401,

Plaintiff,

v.

CITY OF ATLANTIC CITY,  
1301 Bacharach Blvd.  
Atlantic City, NJ 08401,

CITY OF ATLANTIC CITY POLICE  
DEPARTMENT,  
2715 Atlantic Ave.  
Atlantic City, NJ 08401,

HENRY WHITE, Chief, Atlantic City Police  
Department, In His Official Capacity Only,  
2715 Atlantic Ave.  
Atlantic City, NJ 08401,

Defendants.

**UNITED STATES DISTRICT COURT  
District of New Jersey**

Case No. 17-cv-2492 (JHR) (AMD)

Civil Action

**PLAINTIFF GJJM ENTERPRISES, LLC'S  
MOTION FOR PRELIMINARY  
INJUNCTION**

TO: ALL PARTIES

**PLEASE TAKE NOTICE** that on a date and time to be set by the Court, Plaintiff GJJM ENTERPRISES, LLC d/b/a Stiletto, by and through its attorneys, Holtzman & McClain, P.C., will move before the above-captioned Court for a Preliminary Injunction pursuant to Fed. R. Civ. P. 65 prohibiting the City of Atlantic City, its police force, and police chief, from enforcing the “BYOB” advertising ban contained in N.J.S.A. 2C:33-27(a)(2).

Plaintiff GJJM ENTERPRISES, LLC d/b/a Stiletto will rely on the attached Verified Complaint for Declaratory and Injunctive Relief, Petitioner's Brief and Exhibits, if any, in Support of its Petition, as well as the Affidavit of Phillip Griffo.

Respectfully submitted,

/s/ Stephen D. Holtzman (SDH 9921)  
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Counsel for Plaintiff GJJM Enterprises, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that an exact copy of the foregoing motion was provided to all counsel of record via the Court's electronic filing (CM/ECF) system, as well as by regular U.S. mail, postage prepaid, to the City of Atlantic City Solicitor's Office, Atlantic City Hall, 1301 Bacharach Blvd. #406, Atlantic City, NJ 08401 on the 13th day of April, 2017.

/s/ Stephen D. Holtzman (SDH 9921)  
STEPHEN D. HOLTZMAN, ESQUIRE